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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Adopt Biomethane
Standards and Requirements, Pipeline Open Access
Rules, and Related Enforcement Provisions.

Rulemaking 13-02-008
(Filed February 13, 2013)

**JOINT MOTION FOR PARTY STATUS OF THE RURAL COUNTY
REPRESENTATIVES OF CALIFORNIA AND THE ENVIRONMENTAL
SERVICES JOINT POWER AUTHORITY**

**RURAL COUNTY REPRESENTATIVES
OF CALIFORNIA**

John Kennedy, Policy Advocate
1215 K Street, Suite 1650
Sacramento, CA, 95814
Telephone: (916) 447-4806
Email: jkennedy@rcrcnet.org

**ENVIRONMENTAL SERVICES JOINT
POWERS AUTHORITY**

Staci Heaton, Deputy Executive Director
1215 K Street, Suite 1650
Sacramento, CA 95814
Telephone: (916) 447-4806
Email: sheaton@rcrcnet.org

DATE: January 18, 2022

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I. Introduction

The Rural County Representatives of California (RCRC) and the Environmental Services Joint Powers Authority (ESJPA), collectively referred to hereafter as “RCRC/ESJPA,” respectfully moves for joint party status in this proceeding in accordance with Section 1.4 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure.

II. Interest in this Proceeding

- A. RCRC is an association of thirty-eight¹ rural California counties, and its Board of Directors is comprised of elected supervisors from those member counties. Founded in 1972, RCRC works with its membership to advocate on behalf of rural issues and provide

¹ RCRC members include Alpine, Amador, Butte, Calaveras, Colusa, Del Norte, Glenn, Humboldt, Imperial, Inyo, Lake, Lassen, Madera, Mariposa, Mendocino, Merced, Modoc, Mono, Monterey, Napa, Nevada, Placer, Plumas, San Benito, San Luis Obispo, Santa Barbara, Shasta, Sierra, Siskiyou, Sonoma, Sutter, Tehama, Trinity, Tulare, Tuolumne, Yolo and Yuba counties.

the rural county perspective on a myriad of issues at the state and federal levels through both the legislative and regulatory processes. A core tenant of RCRC is to promote a greater understanding among policy makers about the unique challenges that face California's small population counties. Rural counties are on the front lines in providing a full range of services that are the "nuts and bolts" of representative democracy and service delivery. In that capacity, counties often own and operate landfills and are charged with meeting the state's solid and organic waste diversion requirements.

- B.** ESJPA is a local government agency affiliated with RCRC that was formed in 1993 to assist its rural county members to comply with solid waste regulatory requirements and waste diversion goals. ESJPA is currently comprised of 24 rural counties². ESJPA provides regulatory advocacy and technical assistance to these rural counties, supports local public education campaigns and administers various grants for recycling and hazardous waste management programs.
- C.** RCRC/ESJPA have conducted extensive engagement with the State Legislature and the California Department of Resources Recycling and Recovery (CalRecycle) on organic waste diversion goals³ and the SB 1383 Short Lived Climate Pollutant (SLCP) organic waste reduction regulations. These new laws present numerous challenges for local solid waste management programs and landfill operations, especially in rural settings. As owners and operators of solid waste facilities, and being subject to CalRecycle's extensive solid and organic waste regulatory system, RCRC/ESJPA are very interested in the proposed CPUC Biomethane Procurement Program. RCRC/ESJPA offers a unique perspective that is underrepresented in this proceeding. RCRC/ESJPA will use our

² ESJPA members include Alpine, Amador, Butte, Calaveras, Colusa, Del Norte, El Dorado, Glenn, Imperial, Inyo, Lake, Lassen, Madera, Mariposa, Modoc, Mono, Nevada, Plumas, Shasta, Sierra, Siskiyou, Tehama, Trinity, and Tuolumne counties.

³ Senate Bill 1383 (Chapter 395, Statutes of 2016) seeks address methane emission reduction goals of Short-Lived Climate Pollutants (SLCPs) from landfill operations. SB 1383 established specified targets for reducing organic waste in landfills consistent with Assembly Bill 1826 (Chapter 727, Statutes of 2014), the mandatory commercial organic waste diversion bill requiring 50 percent diversion of organics from landfills by 2020, and then 75 percent by 2025. SB 1383 also requires CalRecycle, in consultation with the California Air Resources Board (CARB), to adopt regulations to meet the specified organic waste reduction goals. These regulations take effect for jurisdictions on or after January 1, 2022.

technical and operational experiences gained through running solid waste landfills and organic waste diversion programs to provide feedback on the proposed procurement program, highlight unintended consequences of drafting ambiguities, and propose modifications to better achieve the program's intended goals.

III. Notice

Service of notices, orders, and other correspondence in this proceeding should be directed to RCRC at the address set forth below:

John Kennedy
Rural County Representatives of California
1215 K Street, Suite 1650
Sacramento, CA 95814
Tel: (916) 447-4806
E-mail: jkennedy@rcrcnet.org

IV. Conclusion

The participation of RCRC/ESJPA in this proceeding will not prejudice any party and will not delay the schedule or broaden the scope of the issues in the proceeding. For the reasons stated above, RCRC/ESJPA respectfully requests that the CPUC grant this joint Motion for Party Status filing.

Respectfully submitted,

/s/ John Kennedy

John Kennedy
Policy Advocate, RCRC
Tel: (916) 447-4806
E-mail: jkennedy@rcrcnet.org

/s/ Staci Heaton

Staci Heaton
Deputy Executive Director, ESJPA
Tel: (916) 447-4806
Email: sheaton@rcrcnet.org

Dated: January 18, 2022